

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CHARLES LEACH, on behalf of himself and
all others similarly situated,

Plaintiffs,

v.

HONEYWELL INTERNATIONAL INC., a
Delaware corporation,

Defendant.

Case Number: 1:14-CV-12245-LTS

**PLAINTIFFS' UNOPPOSED MOTION
FOR AWARD OF ATTORNEYS' FEES,
LITIGATION EXPENSES, AND
INCENTIVE AWARDS**

Plaintiffs Charles Leach, Scott Johnsen, Derek Scott, Robert Burke, and Mark Riley (“Plaintiffs”) respectfully move the Court for an award of attorneys’ fees, litigation expenses, and incentive awards, as outlined in the Settlement Agreement (“Agreement”) entered into between the Plaintiffs and Honeywell International Inc. [Doc. 94-3.] Plaintiffs’ motion is based on the accompanying Memorandum of Law, the declarations submitted herewith, documents of record in this matter, and the arguments of Class Counsel.

WHEREFORE, Plaintiffs respectfully request this Court grant this Motion for Award of Attorneys’ Fees, Litigation Expenses, and Incentive Awards, and Order Honeywell to pay (1) \$1,150,000 to Class Counsel for attorneys’ fees and litigation expenses, as outlined in the accompanying memorandum of law and proposed order, and (2) incentive awards to the named Plaintiffs as follows: \$4,000 to Charles Leach; \$4,000 to Scott Johnsen; \$4,000 to Derek Scott; \$2,000 to Robert Burke; and \$2,000 to Mark Riley.

Dated: July 25, 2017

Respectfully submitted,

/s/ Charles J. LaDuca

Charles J. LaDuca

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LOCAL RULE 7.1 CERTIFICATE

I hereby certify pursuant to Local Rule 7.1(a)(2) that the moving party has conferred in good faith with opposing counsel on the matter set forth herein and that opposing counsel does not oppose the relief sought herein.

/s/ Charles J. LaDuca

Charles J. LaDuca

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent via U.S. first class mail to those indicated as non-registered participants, this 25th day of July, 2017.

/s/ Charles J. LaDuca

Charles J. LaDuca